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*Attorneys for Defendants GORDON CLARK,
RODNEY KOCH, CINDY LOU ELLEN KOCH,
and KRYSTAL LEE CLARK*

**IN THE UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

LUCKY LAKE FARM & WATER LIMITED
PARTNERSHIP, a Saskatchewan Limited
Partnership; and SWIFT RIVER FARMS
LTD., an Alberta corporation;

Plaintiffs,

VS.

GORDON CLARK, an individual; RODNEY KOCH A/K/A GORDON CLARK, an individual; CINDY LOU ELLEN KOCH, an individual; KRYSTAL LEE CLARK, an individual; MICHAEL ROSE, an individual; MICHAEL ROSE & ASSOCIATES STRATEGIC CONSULTING INC., a Nova Scotia corporation; JEFF HOUGHTON, an individual; TW INTERNATIONAL INVESTMENTS LTD., a Bahamian Registered company; TW ADVISORS LTD., a British Virgin Islands registered company; TW FUNDS INC., a British Virgin Islands registered company; LA BELLA VITA EQUESTRIANS LLC, a Nevada limited liability company; LA BELLA VITA INTERNATIONAL EQUINE SALES LLC, a Nevada limited-liability company; LIQUID LUXURY GROUP LLC, a Nevada limited liability company; BLACKSTONE LUXURY GROUP LLC, a Nevada limited liability company; DOES I-XX, inclusive; and ROE CORPORATIONS, I-X, inclusive.

Defendants.

Case No.: 2:23-cv-01768-GMN-VCF

STIPULATION AND [PROPOSED]
ORDER EXTENDING TIME FOR
DEFENDANTS GORDON CLARK,
RODNEY KOCH, CINDY LOU ELLEN
KOCH, AND KRYS TAL LEE CLARK
TO FILE ANSWER TO FIRST
AMENDED COMPLAINT

1 Plaintiffs and Defendants Gordon Clark, Rodney Koch, Cindy Lou Koch, and Krystal
2 Lee Clark, by and through their respective counsel, hereby stipulate and agree to an Order to
3 extend the deadline for Defendants Gordon Clark, Rodney Koch, Cindy Lou Koch, and Krystal
4 Lee Clark to file their responsive pleading to Plaintiffs' First Amended Complaint (ECF 30) from
5 December 19, 2023, to January 9, 2024. This is the first request for such an extension, and it is
6 made as follows:

7 1. On December 5, 2023, Plaintiffs filed their First Amended Complaint (ECF 30).
8 The deadline for Defendants Gordon Clark, Rodney Koch, Cindy Lou Koch, and Krystal Lee
9 Clark to respond is December 19, 2023.

10 2. The parties are engaged in settlement discussions and therefore agree to this brief
11 extension. This request is made in good faith and for good cause and not for any purpose of
12 delay or harm.

13 NOW THEREFORE, the Parties hereby stipulate to the entry of an order extending the
14 deadline for Defendants Gordon Clark, Rodney Koch, Cindy Lou Koch, and Krystal Lee Clark
15 to file their responsive pleading to Plaintiffs' First Amended Complaint (ECF 30) from December
16 19, 2023, to January 9, 2024.

17 Dated this 19th day of December, 2023.

18 **ALDRICH LAW FIRM, LTD.**

19 /s/ John P. Aldrich

20 John P. Aldrich, Esq.

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26 *Attorney for Defendants GORDON CLARK,*

27 *RODNEY KOCH, CINDY LOU ELLEN*

28 *KOCH, and KRISTAL LEE CLARK*

29 Dated this 19th day of December, 2023.

30 **FLYNN GIUDICI, PLLC**

31 /s/ Shamus S. Flynn

32 Shamus S. Flynn

33 Nevada Bar No. 14870

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39 *Attorneys for Plaintiffs*

40

ORDER

IT IS SO ORDERED.

CAM FERENBACH,
US MAGISTRATE JUDGE

DATED: December 20, 2023